

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA
Plaintiff,**

No. 06-20663

v.

Hon. Avern Cohn

DANNY JONES,

Defendant.

**MOTION TO EXTEND DEFENDANT'S VOLUNTARY SURRENDER TO
THE BUREAU OF PRISONS**

Comes Now Defendant and moves this Honorable Court to allow Defendant, Danny Jones, to extend his voluntary surrender beyond the July 15, 2010 date previously ordered for the following reasons:

- 1 Defendant Danny Jones was sentenced to 36 months on each count to run concurrent on or about December 10, 2009;
- 2 Because of Defendant's ongoing medical treatment necessitated by being shot fourteen times prior to sentencing, he was allowed to remain on bond through July 15, 2010;
- 3 Since the imposition of sentence, Defendant has received extensive medical care, including surgeries stemming from his fourteen gunshot wounds;
- 4 Defendant has advised counsel that he is still under doctor's care and that further surgeries are required both on his jaw and stomach. Medical reports have been ordered and shall be attached when counsel

receives the reports.;

Wherefore, Defendant respectfully requests an extension of time for voluntary surrender up to and including March 15, 2011.

Respectfully submitted,

/s/ Daniel J. Bruntrager

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CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of July 2010 the foregoing **Motion to Extend Defendant's Voluntary Surrender to the Bureau of Prisons** was sent via email to Dawn Ison, Assistant U.S. Attorney at dawn.ison@usdoj.gov and lorraine.boehm@usdoj.gov.

/s/ Daniel J. Bruntrager